

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

KALOMA CARDWELL,

Plaintiff,

v.

DAVIS POLK & WARDWELL LLP,
THOMAS REID, JOHN BICK, WILLIAM
CHUDD, SOPHIA HUDSON, HAROLD
BIRNBAUM, DANIEL BRASS, BRIAN
WOLFE, and JOHN BUTLER,

Defendants.

19 Civ. 10256 (GHW)

**DECLARATION OF SUSANNA BUERGEL IN SUPPORT OF
DEFENDANTS' MOTION FOR FEES AND COSTS**

I, Susanna Buergel, declare pursuant to 28 U.S.C. § 1746 that:

1. I am a partner at the law firm of Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, New York 10019, counsel for defendants.

2. I submit this declaration pursuant to the Court's June 28, 2021 order, ECF 190, in which the Court indicated that it would order the imposition of fees in connection with defendants' motion for fees and costs incurred as a result of failure by plaintiff and his counsel to comply with their discovery obligations.

3. I have reviewed the hours actually spent by counsel and support staff, and the amounts actually invoiced to defendants in connection with defendants' motion to compel, heard by the Court on January 13, 2021.

4. Appended to this affirmation as Exhibit A, and further to my declaration of January 20, 2021, ECF 132, is a chart with itemized time entries for the work described in ¶¶ 4-6 of my January 20, 2021 declaration. *Id.*

I declare under penalty of perjury that the foregoing is true and correct.

By: /s/Susanna Buerger
Susanna Buerger

July 15, 2021
New York, New York